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July 16, 2015

VIA ECF:

Hon. Cathy Seibel
Charles L. Brieant United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *The Wave Studio, LLC v. American Express Company*, Case No. 7:15-CV-03420-CS

The Wave Studio, LLC v General Hotel Management Ltd., et al.
Case No. 7:13-CV-9239-CS-PED

Dear Judge Seibel:

I write as counsel for TVL LP f/k/a TRAVELOCITY.COM LP d/b/a travelocity.com (“TVL”), one of the defendants in *The Wave Studio, LLC v. General Hotel Management Ltd., et al.*, Case No. 7:13-CV-9239-CS-PED (“GHM litigation”). Currently, the Court ordered stay applies to TVL in the GHM litigation.

TVL is also an interested party in the now consolidated case *The Wave Studio, LLC v. American Express Company*, Case No. 7:15-CV-03420-CS. TVL had a contract with American Express Company (“AMEX”) to manage one of AMEX’s travel websites mentioned in the Wave Studio, LLC (“Wave”) complaint. The contract included an indemnification clause and AMEX has sought partial indemnity from TVL.

TVL has reviewed AMEX Company’s letter, dated July 2, 2015 to Your Honor regarding AMEX’s request for a stay. If Wave proceeds in litigation against General Hotel Management, Ltd. and AMEX, then the same issue of whether Ms. Junior Lee owns the copyrights to certain images in question will be litigated twice. TVL is in agreement with AMEX’s position on the Motion to Stay.

Respectfully submitted,

Carl M. Perri

CMP:mm

cc: All parties via ECF